



California Regional Water Quality Control Board

Santa Ana Region



Linda S. Adams
Secretary for
Environmental Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221
www.waterboards.ca.gov/santaana

Arnold Schwarzenegger
Governor

June 1, 2006

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

**DISCUSSION OF U.S. NAVY'S RESPONSE TO COMMENTS – SITE ASSESSMENT
ADDENDUM REPORT, UNDERGROUND STORAGE TANK (UST) 367 SITE,
FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER ID:
T0605901125**

Dear Mr. Newton:

We have reviewed the above referenced document, dated February 2006, which we received on March 2, 2006. The Navy's response was to our January 30, 2006 comments on the Site Assessment Addendum Report, UST 367 Site. We have the following additional comments on the Navy's response:

- Response No. 1, General Response to Applicability of SVE at UST 367: We do not agree with your conclusion that no further action for this site is supported by the pilot study. Our opinion remains that a complete or sufficient measurement of soil vapor extraction (SVE) technology did not occur.
- Response No. 2: We concluded from our review of the report that a detailed operational history for the SVE system was missing. In your response, you disagree with our conclusion. Note that you have not provided the appropriate sampling and analytical data that would be necessary to support the counter claims in your response. Without this information, the report is incomplete. Please provide the information that would clarify the operational history for the SVE pilot study.
- Response No.3: We consider this response as "not responsive." Instead of addressing our comment on the accuracy and appropriateness of using a photo ionization detector as the primary contaminant detector, your response reiterates the same arguments that you initially presented.
- Response No. 4: Data validation is of no value if sample mass is lost prior to receipt of the sample at the laboratory. We believe our comment remains valid.

California Environmental Protection Agency

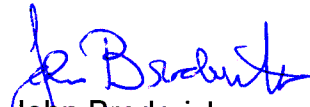


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- Response No. 5: We consider this response as "not responsive." We remain unconvinced that the diesel range component was measured and reported.
- Response No. 6: Even if the test data were completely presented in the report (a point that has not been verified), we remain unconvinced that a complete or sufficient measurement of soil vapor extraction technology occurred.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,


John Broderick
SLIC/DoD Section

cc via email: Ms. Lynn Hornecker, BRAC PMO WEST
Ms. Content Arnold, BRAC PMO WEST

